

REMARKS

Claims 1-31 are currently pending in the application. No claims have been amended, added, or canceled. Applicant respectfully requests reconsideration of the application in view of the following remarks.

Claims 1-4, 12-15, 19-20, 26-29, and 31 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0197992 to Nizri et al. ("Nizri"). Nizri is directed to a mobile wireless telecommunications system. Applicant respectfully submits that Nizri fails to teach or suggest at least one of the distinguishing features of independent claim 1, namely, selecting a new PLMN to serve a mobile station from the PLMNs neighboring a PLMN currently serving the mobile station based upon a list of data.

Nizri discloses a system including a base station of a first type operating over a first air interface and a base station of a second type operating over a second air interface. In contrast to claim 1, there is no teaching or suggestion by Nizri of selecting a new PLMN to serve a mobile station from the PLMNs neighboring a PLMN currently serving the mobile station based upon a list of data.

In Nizri, the mobile station selects a suitable PLMN. After successfully selecting the PLMN, the mobile station continues to search for a suitable cell. Upon successful cell selection, the mobile station camps on the selected cell and carries out normal camped cell activity as appropriate. Periodically, the mobile station monitors neighboring cells on an active air interface. When cell reselection criteria are met, the mobile station attempts to perform cell reselection. In Nizri, a new cell is selected and not a new PLMN based upon a list of data as claimed.

Applicant respectfully submits that claim 1 distinguishes over Nizri and is in condition for allowance. Withdrawal of the rejection of claim 1 as anticipated by Nizri is respectfully requested.

Dependent claims 2-4 and 12 depend from and further restrict independent claim 1 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 1, dependent claims 2-4 and 12 distinguish

over Nizri and are in condition for allowance. Withdrawal of the rejection of dependent claims 2-4 and 12 is respectfully requested.

Independent claim 13 is directed to a method for selecting a PLMN to serve a mobile station. Applicant respectfully submits that Nizri fails to teach or suggest at least one of the distinguishing features of independent claim 13, namely, selecting a new PLMN from a list of neighboring PLMNs as a new PLMN to serve a mobile station.

In Nizri, a mobile station selects a suitable PLMN. After successfully selecting the PLMN, the mobile station continues to search for a suitable cell. Upon successful cell selection, the mobile station camps on the selected cell and carries out normal camped cell activity as appropriate. Periodically, the mobile station monitors neighboring cells on an active air interface. When cell reselection criteria are met, the mobile station attempts to perform cell reselection. In Nizri, a new cell is selected and not a new PLMN based upon a list of neighboring PLMNs as claimed.

Applicant respectfully submits that claim 13 distinguishes over Nizri and is in condition for allowance. Withdrawal of the rejection of claim 13 as anticipated by Nizri is respectfully requested.

Dependent claims 14-15 and 19-20 depend from and further restrict independent claim 13 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 13, dependent claims 14-15 and 19-20 distinguish over Nizri and are in condition for allowance. Withdrawal of the rejection of dependent claims 14-15 and 19-20 is respectfully requested.

Independent claim 26 is directed to a mobile terminal. Applicant respectfully submits that Nizri fails to teach or suggest at least one of the distinguishing features of independent claim 26, namely, a neighbor list containing data received from a serving PLMN enabling selection of a PLMN neighboring a serving PLMN as a new serving PLMN. In addition, Nizri fails to teach or suggest a control logic for selecting a new serving PLMN responsive to a data of the neighbor list.

In Nizri, a mobile station selects a suitable PLMN. After successfully selecting the PLMN, the mobile station continues to search for a suitable cell. Upon successful cell selection, the mobile station camps on the selected cell and carries out normal camped cell activity as appropriate. Periodically, the mobile station monitors neighboring cells on an active air interface. When cell reselection criteria are met, the mobile station attempts to perform cell reselection. In Nizri, a new cell is selected and not a new serving PLMN responsive to a data of a neighbor list as claimed.

Applicant respectfully submits that claim 26 distinguishes over Nizri and is in condition for allowance. Withdrawal of the rejection of claim 26 as anticipated by Nizri is respectfully requested.

Dependent claims 27-29 depend from and further restrict independent claim 26 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 26, dependent claims 27-29 distinguish over Nizri and are in condition for allowance. Withdrawal of the rejection of dependent claims 27-29 is respectfully requested.

Independent claim 31 is directed to a method for selecting a PLMN to serve a mobile station. Applicant respectfully submits that Nizri fails to teach or suggest at least one of the distinguishing features of independent claim 31, namely, selecting a new PLMN to serve the mobile station from the PLMNs neighboring a PLMN currently serving the mobile station based upon an identifying information and changing the mobile station to the selected new PLMN.

In Nizri, a mobile station selects a suitable PLMN. After successfully selecting the PLMN, the mobile station continues to search for a suitable cell. Upon successful cell selection, the mobile station camps on the selected cell and carries out normal camped cell activity as appropriate. Periodically, the mobile station monitors neighboring cells on an active air interface. When cell reselection criteria are met, the mobile station attempts to perform cell reselection. In Nizri, a new cell is selected and not a new PLMN to serve a mobile station based upon an identifying information as claimed.

Applicant respectfully submits that claim 31 distinguishes over Nizri and is in condition for allowance. Withdrawal of the rejection of claim 31 as anticipated by Nizri is respectfully requested.

Claims 5-7, 21-25, and 30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nizri in view of U.S. Patent No. 5,809,416 to Pinault et al. ("Pinault"). Dependent claims 5-7 depend from and further restrict independent claim 1. Pinault has been cited as disclosing a location area information comprising at least one mobile country code associated with a network neighboring a PLMN currently serving a mobile station. Applicant respectfully submits that Pinault fails to cure the deficiencies noted above of Nizri. For at least the reasons set forth above with respect to the rejection of independent claim 1, dependent claims 5-7 are deemed by Applicant to distinguish over the combination of Nizri and Pinault and be in condition for allowance. Withdrawal of the rejection of dependent claims 5-7 is respectfully requested.

Independent claim 21 is directed to a method for selecting a preferred PLMN to serve a mobile station. Applicant respectfully submits that the combination of Nizri and Pinault fails to teach or suggest at least one of the distinguishing features of independent claim 21, namely, selecting a preferred PLMN as a new serving PLMN if an at least one mobile country code is associated with a preferred PLMN.

In Nizri, a mobile station selects a suitable PLMN. After successfully selecting the PLMN, the mobile station continues to search for a suitable cell. Upon successful cell selection, the mobile station camps on the selected cell and carries out normal camped cell activity as appropriate. Periodically, the mobile station monitors neighboring cells on an active air interface. When cell reselection criteria are met, the mobile station attempts to perform cell reselection. In Nizri, a new cell is selected and not a new PLMN to serve the mobile station based upon an identifying information as claimed. Applicant respectfully submits that Pinault fails to cure the deficiencies of Nizri disclosed above.

Applicant respectfully submits that claim 21 distinguishes over the combination of Nizri and Pinault and is in condition for allowance. Withdrawal of the rejection of claim 21 as anticipated by Nizri is respectfully requested.

Dependent claims 22-25 and 30 depend from and further restrict independent claim 21. Pinault has been cited as disclosing location area information which comprises a country code. Applicant respectfully submits that Pinault fails to cure the deficiencies noted above of Nizri.

Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 21, dependent claims 22-25 and 30 distinguish over the combination of Nizri and Pinault and are in condition for allowance. Withdrawal of the rejection of dependent claims 22-25 and 30 is respectfully requested.

Claims 8-11 and 16-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nizri. Dependent claims 8-11 depend from and further restrict independent claim 1 in a patentable sense. Dependent claims 16-18 depend from and further restrict independent claim 13 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claims 1 and 13, respectively, dependent claims 8-11 and 16-18 distinguish over Nizri and are in condition for allowance. Withdrawal of the rejection of dependent claims 8-11 and 16-18 is respectfully requested.

In view of the above remarks, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

By 

Ross T. Robinson

Registration No.: 47,031

JENKENS & GILCHRIST, A PROFESSIONAL
CORPORATION

1445 Ross Avenue, Suite 3200

Dallas, Texas 75202

(214) 855-4500

Attorneys For Applicant